DOE-CBFO Comments on Draft HWFP for the WIPP (EPA ID No. NM4890139088-TSDF)
Incorporating a Class 3 Modification Establishing New DAC

Attachment 1

Comment No.	Draft Permit Location	Proposed Change	Justification
1	Attachment B, Section B-3c	Radiography and/or visual examination will be used to examine every waste container to verify its physical form. ~~and shall be used in conjunction with acceptable knowledge to determine and/or verify an appropriate packaging configuration for specifying the container-specific drum age criterion (**DAC**).~~	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit.

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2	Attachment B, Section B-3d(1)	The subsequent waste characterization activities depend on the assigned Summary Category Group, since waste within the Homogeneous Solids and Soils/Gravel Summary Category Groups will be characterized using different techniques than the waste in the Debris Waste Summary Category Group. The packaging configuration and rigid liner vent hole presence and diameter necessary to determine the appropriate DAC in accordance with Permit Attachment B1, Section B1-1, shall be documented as part of the characterization information collected during the packaging or repackaging process. This characterization information does not require subsequent verification.	One specific purpose of the DAC modification is to allow sites to use the information that is known because waste has been newly generated or repackaged. Because the required parameters are documented as part of the characterization information during the packaging or repackaging process (i.e., packaging configuration and rigid liner vent hole diameter), a "packaging-specific" DAC may be accurately determined. The existing Permit provides specific confirmation requirements for newly-generated and repackaged wastes. The required visual verification (visual examination technique) of acceptable knowledge is conducted at the time of packaging. The visual verification methodology can be expanded to also include the information necessary to determine the DAC for these wastes. This approach is consistent with the existing Permit. The requirement to document the rigid liner vent hole presence and diameter and number of layers of packaging is proposed for addition to Attachment B, Section B-3d(1). The proposed text also includes language to clarify that subsequent verification of the characterization information collected for assigning a DAC to containers that are newly generated and repackaged is not required.
3	Attachment B, Section B-4a(1)	• Radiography – To verify the TRU mixed waste streams by Waste Matrix Code for purposes of physical waste form identification and determination of sampling and analytical requirements, to identify prohibited items~~, to determine waste packaging configurations, to determine presence and diameter of rigid polyliner vents,~~ and to confirm the waste stream delineation by acceptable knowledge.	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit.

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4	Attachment B, Section B-4a(1)	• Visual Examination – To verify the TRU mixed waste streams by Waste Matrix Code for purposes of physical waste form identification, determination of sampling and analytical requirements, and to identify prohibited items. – To provide a process check on a sample basis by verifying the information determined by radiography ~~, to determine verify waste packaging configurations, to determine and presence and diameter of rigid polyliner vents~~, and to confirm the waste stream delineation by acceptable knowledge.	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit.
5	Attachment B1, Section B1-1a(1)	If a specific packaging configuration cannot be ~~assigned~~ determined based on the data collected during packaging (Attachment B, Section B-3(d)1) and/or repackaging (Attachment B, Section B-3(d)1), ~~characterization and confirmation~~, a conservative default Packaging Configuration Group of 3 for drums and 6 for Standard Waste Boxes (**SWBs**) must be assigned, provided the drums ~~and SWBs~~ do not contain pipe component packaging. If a container is designated as Packaging Configuration Group 4 (i.e., a pipe component), the headspace gas sample must be taken from the pipe component headspace. The DAC for Scenario 3 containers that contain ~~filters or~~ rigid liner vent holes that are ~~either~~ undocumented during packaging (Attachment B, Section B-3(d)1), repackaging (Attachment B, Section B-3(d)1), and/or venting (Section B1-1a[6][ii]) ~~or are other than those listed in Table B1-9~~ shall be determined using the default conditions in footnote~~s "a" and~~ "b" in Table B1-9. The DAC for Scenario 3 containers that contain filters that are either undocumented or are other than those listed in Table B1-9 shall be determined using footnote "a" in Table B1-9.	The additional text clarifies that the DAC will be determined using the information documented for newly generated or repackaged waste containers (i.e., Permit Attachment B, Section B-3d(1), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. The text has been revised to eliminate the references to packaging configuration involving the use of pipe components in standard waste boxes (SWBs). Packaging configurations involving the use of pipe components within SWBs are not anticipated for use and are not currently authorized.

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6	Attachment B1, Section B1-1a(2)	If a specific packaging configuration cannot be ~~assigned~~ determined based on the data collected during packaging (Attachment B, Section B-3(d)1) and/or repackaging (Attachment B, Section B-3(d)1), ~~characterization and confirmation~~, a conservative default Packaging Configuration Group of 3 for drums and 6 for SWBs must be assigned, provided the drums ~~and SWBs~~ do not contain pipe component packaging. If a container is designated as Packaging Configuration Group 4 (i.e., a pipe component), the headspace gas sample must be taken from the pipe component headspace. The DAC for Scenario 3 containers that contain ~~filters or~~ rigid liner vent holes that are ~~either~~ undocumented during packaging (Attachment B, Section B-3(d)1), repackaging (Attachment B, Section B-3(d)1), and/or venting (Section B1-1a[6][ii]) ~~or are other than those listed in Table B1-10~~ shall be determined using the default conditions in footnote~~s "a" and~~ "b" in Table B1-10. The DAC for Scenario 3 containers that contain filters that are either undocumented or are other than those listed in Table B1-10 shall be determined using footnote "a" in Table B1-10.	The additional text clarifies that the DAC will be determined using the information documented for newly generated or repackaged waste containers (i.e., Permit Attachment B, Section B-3d(1), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. The text has been revised to eliminate the references to packaging configuration involving the use of pipe components in SWBs. Packaging configurations involving the use of pipe components within SWBs are not anticipated for use and are not currently authorized.

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7	Attachment B1, Section B1-1a(3)	The determination of packaging configuration consists of identifying the number of confinement layers and the identification of rigid liners when present. Generator/storage sites shall use the default conditions specified in Tables B1-7 through B1-10 or the data documented during packaging (Attachment B, Section B-3(d)1), repackaging (Attachment B, Section B-3(d)1), and/or venting (Section B1-1a[6][ii]) for determining the appropriate DAC ~~radiography and/or visual examination in conjunction with acceptable knowledge (procedural controls, etc.) to determine and/or verify the appropriate sampling scenario and packaging configuration~~ for each container from which a headspace gas sample is collected.	The addition of the "e" is editorial. The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit. The comments propose the deletion of the references to determination of sampling scenario by operators. The operators will not have the information necessary to make the sampling scenario determination. This determination is made at the site project level and verified during data validation. For example, a container with an unvented rigid liner may qualify for sampling scenario 1, 2, or 3 (Draft Permit Table B1-5) based on whether the drum is sampled at the time of venting and the time elapsed between packaging and venting. The operator would not know when the sampling is scheduled to take place or if the sampling would take place at the time of venting. Therefore, the operator would not be able to determine the appropriate sampling scenario. To ensure that the sampling scenario is verified, the requirement that the sampling scenario be verified during the project level data validation is retained.

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8	Attachment B1, Section B1-1a(6)(ii)	• If the headspace gas sample is not taken at the time of drum punching, the presence and diameter of the rigid liner vent hole shall be documented during the punching operation for use in determining an appropriate Scenario 2 DAC. This characterization information does not require subsequent verification.	One specific purpose of the DAC modification is to allow sites to use the information that is known about the rigid liner vent hole diameter because waste containers have been vented by lid punching per Draft Permit Attachment B1, Section B1-1a(6)(ii). Because the rigid liner vent hole diameter is documented during the venting process, a Scenario 2 DAC may be accurately identified. The Scenario 2 DAC (Attachment B1, Table B1-7) are only dependent on the rigid liner vent hole diameter. This is because the Scenario 2 DAC were developed using default packaging configurations. When containers are vented following the requirements of Draft Permit Attachment B1, Section B1-1a(6)(ii), the rigid liner vent hole diameter can be documented based on the size of the punch used. The punching process must provide documented traceability for the punch diameter. Revisions are proposed to clarify that the information collected during the punching operation may be used for determining the presence and diameter of the rigid liner vent hole.

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9	Attachment B1, Section B1-3a	A radiography data form is also used to document the Waste Matrix Code and ~~and~~ estimated waste material parameter weights of the waste~~, and all information used to determine and/or verify the DAC sampling scenario (waste packaging configuration, and rigid liner vent hole presence and diameter) for selecting the appropriate DAC from Tables B1-5 through B1-10 for each container~~.	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit. The comments propose the deletion of the references to determination of sampling scenario by operators. The operators will not have the information necessary to make the sampling scenario determination. This determination is made at the site project level and verified during data validation. For example, a container with an unvented rigid liner may qualify for sampling scenario 1, 2, or 3 (Draft Permit Table B1-5) based on whether the drum is sampled at the time of venting and the time elapsed between packaging and venting. The operator would not know when the sampling is scheduled to take place or if the sampling would take place at the time of venting. Therefore, the operator would not be able to determine the appropriate sampling scenario. To ensure that the sampling scenario is verified, the requirement that the sampling scenario be verified during the project level data validation is retained.

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10	Attachment B1, Section B1-3b(2)	• ~~Identification Verification of Rigid Polyliner Vents and Determination of Vent Diameters~~	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit.
11	Attachment B1, Section B1-3b(2)	A radiography test drum shall include items common to the waste streams to be generated/stored at the generator/storage site ~~and shall also include common waste packaging configurations and rigid liner vent hole diameters~~.	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit.

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12	Attachment B1, Section B1-3b(2)	These items shall be successfully identified by the operator as part of the qualification process. ~~In addition, the operator shall successfully determine and/or verify the sampling scenario, packaging configuration, and rigid liner vent hole presence/absence and diameter in order to document the criteria for selecting the appropriate DAC from Tables B1-5 through B1-10.~~	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit. The comments propose the deletion of the references to determination of sampling scenario by operators. The operators will not have the information necessary to make the sampling scenario determination. This determination is made at the site project level and verified during data validation. For example, a container with an unvented rigid liner may qualify for sampling scenario 1, 2, or 3 (Draft Permit Table B1-5) based on whether the drum is sampled at the time of venting and the time elapsed between packaging and venting. The operator would not know when the sampling is scheduled to take place or if the sampling would take place at the time of venting. Therefore, the operator would not be able to determine the appropriate sampling scenario. To ensure that the sampling scenario is verified, the requirement that the sampling scenario be verified during the project level data validation is retained.

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13	Attachment B1, Section B1-3b(2)	Unsatisfactory performance is defined as the misidentification of a prohibited item~~, failure to identify a packaging configuration, or failure to correctly identify the presence and diameter of a vent hole~~ in a training drum or a score of less than 80% on the comprehensive exam.	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit.

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14	Attachment B1, Section B1-3b(3)	This verification shall include the Waste Matrix Code~~,~~ and ~~and~~ waste material parameter weights~~, and verification shall also include all information used to determine and/or verify the DAC sampling scenario (packaging configuration, and rigid liner vent hole presence and diameter) for selecting the appropriate DAC.~~	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit. The comments propose the deletion of the references to determination of sampling scenario by operators. The operators will not have the information necessary to make the sampling scenario determination. This determination is made at the site project level and verified during data validation. For example, a container with an unvented rigid liner may qualify for sampling scenario 1, 2, or 3 (Draft Permit Table B1-5) based on whether the drum is sampled at the time of venting and the time elapsed between packaging and venting. The operator would not know when the sampling is scheduled to take place or if the sampling would take place at the time of venting. Therefore, the operator would not be able to determine the appropriate sampling scenario. To ensure that the sampling scenario is verified, the requirement that the sampling scenario be verified during the project level data validation is retained.

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15	Attachment B1, Section B1-3b(3)	Visual examination shall be conducted to ~~identify waste packaging configurations, to determine the presence and diameter of rigid polyliner vent holes,~~ describe all contents of a waste container, and includes estimated or measured weights of the contents.	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit.
16	Attachment B1, Section B1-3b(5)	• ~~Identification Verification of Rigid PolyLiner Vent Holes and Determination of Vent Hole Diameters~~	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit.

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17	Attachment B1, Section B1-3b(5)	A description of the waste container contents~~, waste packaging configuration, and the presence and diameter of rigid polyliner vent holes~~ shall be recorded on a data form as implemented in the site QAPjP.	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit.
18	Attachment B1, Table B1-5	A. Unvented drums without rigid ~~poly~~ liners are sampled through the drum lid at the time of venting. B1. Unvented drums with unvented rigid ~~poly~~ liners are sampled through the rigid liner at the time of venting or prior to venting. B2. Vented drums with unvented rigid ~~poly~~ liners are sampled through the rigid liner at the time of venting or prior to venting. C. Unvented drums with vented rigid ~~poly~~ liners are sampled through the drum lid at the time of venting.	The term “polyliner” has been replaced with “liner” for consistency. The use of Scenario 1 DAC requires the sample to be taken before the container is vented. While most sites sample at the time of venting, it is acceptable to sample below the rigid liner prior to venting the container. Descriptions B1 and B2 have been revised to clarify this allowance.
19	Attachment B1, Table B1-5	Scenario 3 Containers (i.e., drums, SWBs, and pipe components) that are initially packaged in a vented condition and sampled in the container headspace and containers that are not sampled under Scenario 1 or 2.	The text has been revised to require the use of Scenario 3 DAC when the other DAC sampling scenarios do not apply. Scenario 3 has the most restrictive DAC.

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20	Attachment B1, Table B1-5	[a] Containers that have not met the Scenario 1 DAC at the time of venting must be categorized under Scenario 3. This requires the additional information required of each container in Scenario 3 (i.e., determination of packaging configuration), and such containers can only be sampled after meeting the appropriate Scenario 3 DAC.	Proposed revision is editorial.
21	Attachment B1, Table B1-6	Note: Containers that are sampled using the Scenario 1 DAC do not require information on the packaging configuration because the Scenario 1 DAC are based on a bounding packaging configuration. In addition, Information on the rigid liner vent hole presence and diameter do not apply to containers that are sampled using the Scenario 1 DAC because they are unvented prior to sampling.	Scenario 1 applies to unvented containers. The DAC for this scenario were calculated using the default packaging configurations. Therefore, the note has been added to clarify that the Scenario 1 DAC do not require the information pertaining to the packaging configuration and rigid liner vent hole diameter.
22	Attachment B1, Table B1-7	Rigid Liner ~~Lid Opening~~ Vent Hole Diameter (in) [b]	The phrase “Liner Lid Opening Diameter” has been replaced with “Rigid Liner Vent Hole Diameter” for consistency.
23	Attachment B1, Table B1-7	[b] The documented rigid liner ~~lid opening~~ vent hole diameter must be greater than or equal to the listed value to use the DAC for the listed rigid liner ~~lid opening~~ vent hole diameter (e.g., a container with a rigid liner ~~lid opening~~ vent hole of 0.5 in. must use a DAC for a rigid liner ~~lid opening~~ vent hole of 0.375 in.). If the rigid liner ~~lid opening~~ vent hole diameter for a container is undocumented during packaging (Attachment B, Section B-3(d)1), repackaging (Attachment B, Section B-3(d)1), and/or venting (Section B1-1a[6][ii]) , that container must use a DAC for a rigid liner ~~lid opening~~ vent hole diameter of 0.30 in.	The phrase “liner lid opening diameter” has been replaced with “rigid liner vent hole diameter” for consistency. The additional text clarifies that the DAC will be determined using the information documented for newly generated or repackaged waste containers (i.e., Permit Attachment B, Section B-3d(1), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC.

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24	Attachment B1, Table B1-7	Note: Containers that are sampled using the Scenario 2 DAC do not require information on the packaging configuration because the Scenario 2 DAC are based on a bounding packaging configuration.	Scenario 2 applies to containers that are vented after the Scenario 1 DAC has been met, but are not sampled at the time of venting. The DAC for this scenario were calculated using the default packaging configurations. Therefore, the note has been added to clarify that the Scenario 2 DAC do not require the information pertaining to the packaging configuration.
25	Attachment B1, Table B1-8	[a] If a specific Packaging Configuration Group~~s~~ cannot be ~~assigned~~ determined based on the data collected during packaging (Attachment B, Section B-3(d)1) and/or repackaging (Attachment B, Section B-3(d)1) ~~characterization and confirmation~~, a conservative default Packaging Configuration Group of 3 for drums and 6 for SWBs must be assigned provided the drums ~~and SWBs~~ do not contain pipe component packaging. If pipe components are present as packaging in the drums ~~or SWBs~~, the pipe components must be sampled following the requirements for Packaging Configuration Group 4.	The word “assigned” has been replaced with “determined” for consistency with the language in Draft Permit Attachment B1, Sections B1-1a(1) and B1-1a(2). The additional text clarifies that the DAC will be determined using the information documented for newly generated or repackaged waste containers (i.e., Permit Attachment B, Section B-3d(1), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. The text has been revised to eliminate the references to packaging configuration involving the use of pipe components in SWBs. Packaging configurations involving the use of pipe components within SWBs are not anticipated for use and are not currently authorized.
26	Attachment B1, Table B1-9	Rigid Liner ~~Lid Opening~~ Vent Hole Diameter [b]	The phrase “Liner Lid Opening Diameter” has been replaced with “Rigid Liner Vent Hole Diameter” for consistency.

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27	Attachment B1, Table B1-9	[b] The documented rigid liner ~~lid opening~~ vent hole diameter must be greater than or equal to the listed value to use the DAC for the listed rigid liner ~~lid opening~~ vent hole diameter (e.g., a container with a rigid liner ~~lid opening~~ vent hole of 0.5 in. must use a DAC for a rigid liner ~~lid opening~~ vent hole of 0.375 in.). If the rigid liner ~~lid opening~~ vent hole diameter for a container is undocumented during packaging (Attachment B, Section B-3(d)1), repackaging (Attachment B, Section B-3(d)1), and/or venting (Section B1-1a[6][ii]), that container must use a DAC for a rigid liner ~~lid opening~~ vent hole diameter of 0.30 in.	The phrase “liner lid opening diameter” has been replaced with “rigid liner vent hole diameter” for consistency. The additional text clarifies that the DAC will be determined using the information documented for newly generated or repackaged waste containers (i.e., Permit Attachment B, Section B-3d(1), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC.
28	Attachment B1, Table B1-10	Rigid Liner ~~Lid Opening~~ Vent Hole Diameter [b]	The phrase “Liner Lid Opening Diameter” has been replaced with “Rigid Liner Vent Hole Diameter” for consistency.
29	Attachment B1, Table B1-10	[b] The documented rigid liner vent hole ~~lid opening~~ diameter must be greater than or equal to the listed value to use the DAC for the listed rigid liner vent hole ~~lid opening~~ diameter (e.g., a container with a rigid liner vent hole ~~lid opening~~ of 0.5 in. must use a DAC for a rigid liner ~~lid opening~~ vent hole of 0.375 in.). If the rigid liner vent hole ~~lid opening~~ diameter for a container is undocumented during packaging (Attachment B, Section B-3(d)1), repackaging (Attachment B, Section B-3(d)1), and/or venting (Section B1-1a[6][ii]), that container must use a DAC for a rigid liner vent hole ~~lid opening~~ diameter of 0.30 in.	The phrase “liner lid opening diameter” has been replaced with “rigid liner vent hole diameter” for consistency. The additional text clarifies that the DAC will be determined using the information documented for newly generated or repackaged waste containers (i.e., Permit Attachment B, Section B-3d(1), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC.

Comment No.	Draft Permit Location	Proposed Change	Justification
30	Attachment B3, Section B3-4	Precision ~~The quantitative determination of the vent hole diameter is verified through confirmatory visual examination and through replicate scan measurements. Because of the criticality of the vent diameter in establishing DAC equilibrium times, the precision limit for a measurement is 0% RPD as defined in Section B3-1.~~	The Draft Permit includes language requiring the use of radiography and/or VE in conjunction with AK information to determine and verify waste packaging configuration and rigid liner vent hole presence and diameter. Information to determine the DAC will be documented for newly generated or repackaged waste containers (i.e., Attachment B, Section B-3d(1)), or waste containers vented by lid punching (i.e., Draft Permit Attachment B1, Section B1-1a(6)(ii)); otherwise, the waste container must be assigned a default DAC. Therefore, the comments propose revisions to clarify that determination and verification of the packaging configuration and rigid liner vent hole presence and diameter by radiography and/or VE are not applicable. The use of the default DAC does not require verification, which is consistent with the implementation of the default DAC in the existing Permit.
31	Attachment B6	If the proposed changes requested by the above comments are accepted by the NMED, the comments must also be reflected by appropriate changes in the Attachment B6 checklists as proposed in Attachment 2.	

Attachment 2

Draft Permit Location	Item No.	Proposed Change
Attachment B6, Table B6-1	26	Are procedures in place to ensure that radiography and/or visual examination are used to: • Examine every waste container to determine the physical form ~~• Identify the waste packaging configuration~~ ~~• Identify the presence and diameter of vent holes~~ • Identify liquids and containerized gases • Verify the physical form matches the waste stream description (Section B-3c)

Attachment B6, Table B6-1	27	Are procedures in place to ensure that the following characterization activities shall occur for newly generated wastes:
		
		• Acceptable Knowledge for all wastes, with confirmatory:
		  • Visual examination during packaging for all waste containers
		  • Headspace gas analysis for all waste containers or randomly selected containers from waste streams that meet the conditions for reduced headspace gas sampling listed in Section B-3a(1)
		  • Total VOC, SVOC, and Metals analyses for a selected number of homogeneous solids and soil/gravel waste containers for control charting purposes (annually thereafter), as specified in Attachment B2
		  • Evaluation of any TICs found in headspace gas and totals analyses
		
		Are procedures in place to ensure that the visual examination during packaging for all waste containers includes the documentation of packaging configuration and rigid liner vent hole presence and diameter necessary to determine the appropriate DAC in accordance with Permit Attachment B1, Section B1-1?
		
		(Section B-3d(1))

Draft Permit Location	Item No.	Proposed Change

Attachment B6, Table B6-1	29	Are procedures in place to ensure that the following characterization activities shall occur for repackaged waste:
		
		• Acceptable Knowledge, with confirmatory:
		  • Visual examination during repackaging for all waste containers
		  • Headspace gas analysis for all waste containers or randomly selected containers from waste streams that meet the conditions for reduced headspace gas sampling listed in Section B-3a(1)
		  • Total VOC, SVOC, and Metals analyses following either the retrievably stored or newly generated waste characterization process, whichever results in greater sampling requirements
		  • Evaluation of any TICs found in headspace gas and totals analyses
		
		Are procedures in place to ensure that the visual examination during repackaging for all waste containers includes the documentation of packaging configuration and rigid liner vent hole presence and diameter necessary to determine the appropriate DAC in accordance with Permit Attachment B1, Section B1-1?
		
		(Section B-3d, B-3d(1))

Attachment B6, Table B6-1	30	Are procedures in place to ensure that the following Data Quality Objectives are met: ... • Use radiography or visual examination to verify physical waste form, identify prohibited items, ~~verify DAC scenario and waste packaging configuration,~~ verify determination of sampling and analytical requirements, and to confirm waste stream delineation by Acceptable Knowledge • Use visual examination as a process check of radiography (Section B-4a(1))
Attachment B6, Table B6-4	185a	~~Are procedures in place to ensure that radiography and/or visual examination are used in conjunction with acceptable knowledge to determine and/or verify the appropriate sampling scenario and packaging configuration for each container from which a headspace gas sample is collected? (Section B1-1a(3))?~~
Attachment B6, Table B6-4	198a	• A flow indicating device to verify excess flow of QC gases for system purge shall be pneumatically connected to the drum punch and operated in the same manner as the flow indicating device used in the manifold system • Equipment are used to secure the drum punch sampling system to the drum lid • If the headspace gas sample is not taken at the time of drum punching, the presence and diameter of the rigid liner vent hole is documented during the punching operation for use in determining an appropriate Scenario 2 DAC. (Section B1-1a(~~36~~)(ii))

Draft Permit Location	Item No.	Proposed Change
Attachment B6, Table B6-5	233	Are process procedures in place to meet the following Quality Assurance Objectives?: <u>Precision</u> • Did the site project QA Officer calculate and report the relative percent difference (RPD) between the ~~vent hole diameter and the~~ estimated waste material parameter (WMP) weights as determined by radiography, and these same parameters as determined by visual examination (VE)? Is the precision of radiography enough to demonstrate compliance with QAOs through identifying an image test pattern? <u>Accuracy</u> • Was the accuracy with which the ~~matrix parameter category~~ waste matrix code and WMP weights can be determined documented through VE of a randomly selected statistical portion of waste containers? • Was the percentage of waste containers which requires a new ~~matrix parameter category~~ waste matrix code or were found to contain prohibited items after VE calculated and reported by the site project QA officer as a measure of radiography accuracy?
Attachment B6, Table B6-5	234	Does the site have procedures to ensure that radiography is used to determine ~~waste packaging configuration, determine the presence and diameter of vent holes, determine~~ the waste material parameter contents and estimate waste material parameter weights of retrievably stored waste? (Section B3-4) Does the site have procedures to identify prohibited materials, and to identify/confirm waste matrix code (physical form)? (Section B-3c)
Attachment B6, Table B6-5	243	Are there procedures to ensure that a radiography data form is used to document the ~~matrix parameter category~~ waste matrix code~~,~~ and ~~and~~ estimated WMP weights of the waste~~, and all information to determine and/or verify the sampling scenario, packaging configuration, and rigid liner vent hole presence and diameter for selecting the appropriate DAC~~? (Section B1-3a)
Attachment B6, Table B6-5	253a	~~Does the documented training program ensure that the radiography test drum includes common waste packaging configurations and rigid liner vent hole diameters appropriate to the specific waste streams for which a waste stream profile form is sought? (Section B1-3b)~~
Attachment B6, Table B6-5	257a	~~Does the documented training program ensure that the operator successfully determines and/or verifies the sampling scenario, packaging configuration and (if appropriate) rigid liner vent hole diameter in order to document the criteria for selecting the appropriate DAC? (Section B1-3b)~~
Attachment B6, Table B6-5	270	Do procedures ensure that the ~~matrix parameter category~~ waste matrix code, and ~~and~~ waste ~~are~~ material parameter weights~~, and information used to determine and/or verify the sampling scenario, packaging configuration, and rigid liner vent hole presence and diameter for selecting the appropriate DAC~~ are verified through a comparison of radiography and visual examination results? (Section B1-3b(3))

Draft Permit Location	Item No.	Proposed Change
Attachment B6, Table B6-6	285	Do site procedures ensure that the site use the data from visual examination to check the ~~waste packaging configuration, presence and diameter of rigid poly liner vent holes,~~ Waste Matrix Code, absence of prohibited items, and waste material parameter weight estimates, as determined by radiography? (Section B1-3b(3))
Attachment B6, Table B6-6	299a	~~Does the documented training program ensure that the operator successfully determines and/or verifies the sampling scenario, packaging configuration and (if appropriate) rigid liner vent hole diameter in order to document the criteria for selecting the appropriate DAC? (Section B1-3b)~~